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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

Charles Baird, individually, and on behalf of all
others similarly situated, and on behalf of the
BlackRock Retirement Savings Plan,

Plaintiff,

v.

BlackRock Institutional Trust Company, N.A.;
BlackRock, Inc.; The BlackRock, Inc.
Retirement Committee; John and Jane Does 1-
40, Members of the BlackRock Retirement
Committee; The Administrative Committee of
the Retirement Committee; John and Jane Does
1-20, Members of the Administrative
Committee of the Retirement Committee; The
Investment Committee of the Retirement
Committee; John and Jane Does 21-40,
Members of the Investment Committee of the
Retirement Committee; each an individual, and
John and Jane Does 41-60, each an individual,

Defendants.

Case No. 17-cv-01892-HSG

**CASE MANAGEMENT STIPULATION
AND [PROPOSED] ORDER**

CASE MANAGEMENT STIPULATION
AND [PROPOSED] ORDER

Pursuant to this Court's Minute Entry of July 12, 2017, ECF No. 49, directing the parties to meet and confer regarding a proposed case schedule and to e-file a stipulation and proposed order proposing a case schedule, plaintiff Charles Baird and the named, non-Doe defendants (collectively, "BlackRock"), jointly submit this case management stipulation and Proposed Order.

The parties' proposed schedule departs somewhat from the guidelines set forth in this Court's Minute Entry but reflects the agreement of the parties following multiple telephonic conferences regarding an appropriate case schedule. The parties respectfully request that the Court allow the proposed departures, which together extend the case schedule by only six weeks.

Event	Deadline
Beginning of fact discovery	Immediately
Substantial completion of document production	December 15, 2017
Deadline to amend pleadings	January 8, 2018 (60 days before close of fact discovery)
Close of fact discovery	March 9, 2018 [Minute Entry: Feb. 9, 2018]
Parties exchange expert report(s)	April 6, 2018
Parties exchange rebuttal expert report(s)	May 7, 2018
Close of expert discovery	June 8, 2018
Plaintiff's motion for class certification	June 21, 2018 [Minute Entry: May 28, 2018]
ADR	Late June/Early July
Opposition to motion for class certification	July 19, 2018
Class certification reply brief	August 2, 2018
Class certification hearing	August 16, 2018 [Minute Entry: July 5, 2018, 2 pm]

Dated: July 26, 2017

COHEN MILSTEIN SELLERS & TOLL, PLLC

By:

/s/ Julia Horwitz
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Attorneys for Defendants

ATTESTATION

I attest that for all conformed signatures indicated by an “/s/,” the signatory has concurred in the filing of this document.

Dated: July 26, 2017

By: /s/ Julia Horwitz
Julia Horwitz

[PROPOSED] ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED: The above Case Management Stipulation and Proposed Order is approved as the Case Management Schedule for this case and all parties shall comply with its provisions.

Dated: _____, 2017

Judge Haywood S. Gilliam, Jr.
U.S. District Court for the
Northern District of California